## **OPERATING PRACTICES**

## Introduction

The Federal Railroad Administration (FRA) has been working in partnership with CSXT's rail labor and management since May 1997 to resolve safety concerns at the Crew Management Center (CMC) located in Jacksonville, Florida.

From June 16 through August 29, 1997, personnel from Regions 2, 3, and 4 of the Federal Railroad Administration (FRA) and the States of West Virginia and Florida conducted an Operating Practices compliance audit of CSXT's:

- ! Program of operational tests and inspections, efficiency tests, and record-keeping under Part 217;
- ! Accident/incident record-keeping under Part 225;
- ! Train dispatching control center; and
- ! Annual monitoring ride and "less than clear" signal testing for Locomotive Engineers under Part 240.

FRA visited 40 CSXT work locations, examined more than 3,000 records, and conducted approximately 150 operating inspections/observations during the 75-day period.

In addition, FRA's OP Inspectors accompanied CSXT officers on 75 efficiency tests, made 50 on-board train observations, and conducted numerous management and labor interviews.

The purpose of FRA's assessment was to:

- ! Determine the effectiveness and accuracy of CSXT's efficiency testing program, including supervisor compliance and training, and internal control and monitoring procedures;
- ! Determine the accuracy of employee injury and occupational illness reporting, address concerns identified in the 1995 compliance audit regarding the failure to

report or update rail equipment accidents/incidents, and review internal control procedures;

- ! Review the 1997 audit concerns at the Jacksonville Train Dispatching Control Center, including Safety Directive 97-1 requirements and documentation;
- ! Determine compliance with the "less than clear" signal testing and operational monitoring observations for certified Locomotive Engineers; and
- ! Address safety concerns at the Crew Management Center, resulting from inadequate staffing of Crew Dispatchers, inappropriate crew balancing, field supervisor and Train Dispatcher interference, insufficient supervisory coverage, improper release of crews, malfunctioning telephones, poor training, and fatigue of train and engine crews.

# Efficiency Test Program Concerns, Discussion, and Recommendations

## Concern: Efficiency Test Manual

FRA found that the testing program failed to meet some of FRA's standards as set forth in 49 CFR Part 217.9.

#### Discussion:

#### FRA's findings follow:

- ! The means and procedures to carry out each type of operational test and inspection were not described in accordance with 49 CFR Part 217.9 (b)(2).
- ! The purpose of each type of test and inspection was not stated in accordance with 49 CFR 217.9 (b)(3).
- ! While they are not explicitly required, procedures to conduct foreign-line tests should be included in the program. The program referenced operational tests and inspections. However, there was no distinction between operational testing and

inspections/observations as required under 49 CFR Part 217.9 (b)(1). The current CSXT program requires that each supervisor conduct a minimum of 30 tests per month. It permits both tests or inspections/observations to be recorded directly into the computerized data base, by the carrier officer, using the same test number. However, during the audit, FRA was unable to determine whether carrier officers had complied with the program or with the requirements for a number of operational tests and inspections under 49 CFR Part 217.9 (c).

- ! The FRA Annual Efficiency Test Report for 1996 showed all activity under its program as an "Efficiency Test Report," instead of creating the distinction required by 49 CFR Part 217.9 (d) for each operational <u>test</u> and <u>inspection</u>.

  Because of this, neither CSXT nor FRA were fully aware of the actual number of tests involving the "conditions set-up type tests" usually reserved for safety-critical rules. As a result, CSXT is providing to FRA inaccurate data. Without accurate data, FRA cannot determine the effectiveness of CSXT's operating rules, nor how well they are understood and followed by employees throughout the system.
- ! CSXT's accident/incident data for 1996 and 1997 support FRA's concern that operating rules are not being followed. For example, during both years, CSXT's Operating Rules 104 (b), (c) and (e) accounted for the largest number of human factor train accidents, while Rules 103 and 103(a) accounted for the second largest group. *Please see the matrix on the next page for details.*

Operating Rules	For Year 1996			For Year 1997		
	Tests Conducted	Failure Rate (Percent)	Human Factor Accidents	Tests Conducted	Failure Rate	Human Factor Accidents
OP Rule 103 and subparts	32,480	2	224 1	10,205	2	51 <sup>1</sup>
OP Rule 104 and subparts	26,207	2	307 <sup>2</sup>	8,911	3	98 <sup>2</sup>
Totals	58,687	N/A	531 1&2	19,116	N/A	149 1&2

This total includes OP Rule 103 and OP Rule 103 (a) only.

This total includes OP Rule 104 (b), (c), and (e) only.

#### Recommendations:

CSXT should review and revise its program to:

- ! Include and record the means, procedures, and purpose of each individual operational test and inspection in the testing program. This measure should ensure system-wide uniformity and improve compliance with 49 CFR Part 217.9, and,
- ! Establish a distinction throughout the program between (1) tests; that is, conditions set-up, and (2) inspections; that is, observations of normal operations. This will also permit CSXT's annual report to properly reflect the testing under (d).

## Concern: List of Qualified Officials

CSXT failed to maintain a list of qualified officers who could conduct efficiency tests.

#### Discussion:

CSXT's Efficiency Test Instruction Manual specifies ?each officer designated will conduct monthly [efficiency tests of] not less than the number of tests shown ... and enter them [test results] into the OSEF computer program." Although not required by regulation, a list of carrier officers who could perform efficiency testing was provided by the system operating rules department. It was found to be incomplete and not current with the carrier officers presently assigned in the field.

#### Recommendation:

CSXT should maintain a current list of qualified carrier officers who conduct efficiency tests.

## Concern: Train Dispatcher Efficiency Testing

Testing at the train dispatching center in Jacksonville, Florida, indicated that carrier officers in the control center were not testing for a wide range of accident prevention

operating rules. Also, testing of the Train Dispatchers by carrier officers in the field was very minimal. In either case, the amount of nighttime tests did not meet the 50 percent requirement of the CSXT program.

#### Discussion:

In 1996, a total of 11,767 tests was conducted, 27 percent during nighttime hours. In 1997, a total of 3,879 tests was conducted, 29 percent during nighttime hours. The failure rate was 5 percent both years.

#### Recommendation:

CSXT should develop specific standards for Train Dispatcher testing, which are separate from other testing standards. The railroad should conduct periodic monitoring of carrier officer testing data to assure that a variety of operating rules are tested. CSXT also should review accident/incident data and establish testing in those areas where train dispatching performance is of concern.

## Concern: Amtrak Efficiency Testing

CSXT officers rarely performed unannounced efficiency tests that would evaluate the ability of the crew to carry out its responsibilities while operating Amtrak passenger trains.

#### Discussion:

During FRA's interviews with carrier officers, they stated that they did not test these trains because "they are running on a schedule." While some areas of CSXT had conducted unannounced testing, overall, the majority of all testing was found to be observational type activity, *i.e.* headlights, marking devices, horn, station stops, etc. In particular, FRA found that on the C&O Business Unit, the carrier officers' instruction manual permitted unannounced tests without penalty for train delays. However, carrier officers at this location still failed to conduct quality tests.

#### Recommendation:

CSXT should establish separate testing standards, based on the number of Amtrak operations, for each service lane, business unit, and division to ensure adequate testing of Amtrak/CSXT crews.

## Concern: Carrier Officer Efficiency Testing

CSXT failed to properly monitor its efficiency testing program. The audit found that in each of the business units, service lanes, and divisions, there were some carrier officers who carried out their testing in the manner intended by 49 CFR Part 217. However, other carrier officers failed to follow all or part of the CSXT program.

#### Discussion:

In particular, two train collisions since 1996 involved violations of rules (Approach Signal and DTC) for which insufficient efficiency testing had been conducted. While it cannot be stated that additional testing would have prevented these accidents, it certainly would have raised employee awareness to the importance of these rules.

On each of the service lanes, business units, and divisions, some carrier officers conducted their testing in the manner required by the regulation. This demonstrated that even with a program that failed to meet parts of the regulation, quality testing was conducted. However, some carrier officers did not follow the regulation's minimum requirements. Discussions with local and system supervisors indicated that monitoring of the program was not always properly conducted due to limited staffing or time constraints.

#### Recommendation:

CSXT must establish an effective monitoring system of the efficiency testing program to assure uniform carrier officer testing.

### Concern: <u>Locomotive Engineer Certification</u>

CSXT failed to maintain a current list of certified Locomotive Engineers as required by 49 CFR Part 240.

#### Discussion:

This review only involved two aspects of 49 CFR Part 240, the Locomotive Engineer roster and "Less Than Clear" testing.

FRA requested for review the most current 1996 CSXT computerized printouts of certified Locomotive Engineers, labor, and management, in the Northern and Southern Regions. FRA found that these printouts were not current. A second printout was then obtained for the Northern Region from the Engineer training facility at Cumberland, Maryland. This printout was incomplete. The printouts included Locomotive Engineers who were retired or on disability leave, newly hired trainees, and carrier officers who had not maintained their qualifications for several years.

A total of 2,800 certified Locomotive Engineers was reviewed for the "less than clear" unannounced signal test. Using the CSXT computer data base to determine "active" Locomotive Engineers, and using cross check efficiency testing, FRA found 283 Engineers whose status could not be determined. A further review was conducted of 28 Engineers (10 percent sampling) to determine if any of these individuals had operated in signalled territory. It was determined that 14 (50 percent) had operated regularly in signalled territory and could have been tested in 1996. The other 50 percent operated in yards, DTC, etc.

Currently, the efficiency test program does not include this test data. The test information, as required by Sections 240.215 (a) and (e)(1), is maintained in a separate data base. It is manually created by the designated supervisory Locomotive Engineers and kept in their personal files, not at system headquarters with data from the other efficiency tests. Including this information with data from efficiency testing conducted in compliance with Section 217.9(a) would make the data base more useful as an analysis and planning tool.

FRA found 14 violations documented for the "less than clear" testing. A deficiency report was filed for failure to maintain hard copies of the operational monitoring observation.

#### Recommendations:

#### CSXT should:

- ! Ensure that a current list of certified Locomotive Engineers is maintained;
- ! Consider centralizing the Locomotive Engineer records, currently maintained by the field designated carrier officers, at the training centers to better monitor them and ensure compliance with the requirements of Sections 240.303 (b), (c); and
- ! Review and consider incorporating collection of the "less than clear" testing results into the efficiency test program data base versus separate record-keeping.

# Accident/Incident Reporting Concerns, Discussion, and Recommendations

## Concern: <u>Employee Injury and Illness Reports</u>

CSXT failed to maintain accurate record-keeping to determine the reportability of employee injuries and illnesses.

#### Discussion:

A total of 990 employee injury and occupational illness records was reviewed. Of these 990 records, 240 were then selected for an additional review with the Medical and Claims Departments records. A total of 19 violations was identified: 14 for failure to report and five for late reporting.

FRA's Inspectors noted a concern with CSXT's documentation of employee injuries. In some cases, the files did not contain enough information to determine if reportability existed. During review of the files with the medical and claims departments, FRA reviewed two cases for issuance of prescription medication. FRA found that a record of one prescription was unavailable, although the employee said he had received one. It was determined that employees could see their doctors and be issued prescriptions under Aetna Health Insurance. It is possible that the prescription will never be reported since the doctor typically does not send a copy to CSXT. The employee fills the prescription at

the local pharmacy, and Aetna Health Insurance covers the cost. The claims department never has to cover the cost nor report to CSXT. In this case, CSXT will not have the information to determine reportability. Another concern is that the employees may be using prescription drugs that impair their ability to function on the job.

#### Recommendation:

CSXT needs to immediately review its Internal Control Plan (ICP) to determine compliance with FRA regulations and its own procedures and plan.

## Concern: Accident/Incident Reports

CSXT failed to maintain accurate record-keeping to determine reportability of rail equipment accidents and incidents.

#### Discussion:

This audit covered report year 1996. A total of 50 highway-rail grade crossing accidents/incidents were reviewed by FRA. Each had been properly reported, and a Form FRA F 6180.54 (Rail Equipment Accident/Incident Report) had been submitted for those that exceeded the reporting threshold for rail equipment damages (\$6,300).

FRA reviewed a total of 2,100 reportable and non-reportable rail equipment accidents/incidents. Of the 2,100 accidents/incidents, 425 were selected for additional auditing of the Mechanical and Engineering Department damage records. A total of 55 violations was identified and forwarded: 25 for failure to report, and 30 that had been reported, but not updated.

FRA still has concern about CSXT's documentation of initial and updated damage figures. Initial review of the CSXT reports disclosed that there were rail equipment accidents/incidents without costs recorded. While some accidents/incidents may not have had any mechanical or engineering (track) damage costs, the data indicated that these accidents/incidents would have had labor costs due to re-railing cars or track repairs. A comparison of 1996 and 1997 data indicated that little improvement had been made in this area.

#### Recommendation:

Effective immediately, CSXT should review and correct any deficiencies found regarding compliance with the revised 49 CFR Part 225 Rail Equipment Reporting and Record-keeping regulations, which became effective January 1, 1997. CSXT needs to ensure compliance with its 1997 ICP by immediately conducting a 6-month audit of its 1997 records.

### Concern: <u>Drug and Alcohol Testing</u>

CSXT conducts "testing for cause" under a labor agreement. CSXT has been incorrectly conducting "testing for cause", e.g. after an employee injury, CSXT used the Federal test form to conduct and record drug and alcohol tests.

#### Discussion:

The review involved one month, May 1996. A total of 54 agreement tests was found to have been conducted using the Federal form. In some cases, the reason for the tests was recorded as "post-accident." None of the injuries should have been tested under FRA authority, nor reported on the Federal form.

FRA discussed this issue with the CSXT Chief Medical Officer on August 27. It was determined that the contractor was using the wrong form and had since been instructed to use the non-Federal form. However, a preliminary review of 1997 files for June disclosed 37 "agreement tests" conducted using the Federal form.

A total of 10 violations has been filed for the improper use of a Federal test form. Additionally, one violation was filed for conducting a mandatory test for a rail-equipment accident that did not meet FRA criteria.

#### Recommendation:

CSXT must conduct refresher testing to ensure that carrier officers and contractors who conduct drug and alcohol testing are instructed on the distinction between Federal testing requirements and requirements for carrier "agreement testing," and the proper forms to be used for each. In addition, periodic internal management audits will enhance reporting performance.

## Concern: Intimidation/Harassment Issues

CSXT employees perceive they or their co-workers are intimidated and harassed by CSXT supervisors and managers.

#### Discussion:

A total of 62 employees was interviewed by telephone regarding injuries received on the job. They were randomly selected and interviewed regarding reportable and non-reportable injuries. Some of the criteria used for the selection were type of injury and delays in the reporting process, whether by the employee or CSXT. The results of the interviews indicated that 44 percent of the employees interviewed believed that intimidation existed and was used by CSXT officers. However, they either did not believe or were unable to support that CSXT officers had intimidated or harassed them regarding their own injuries.

At two of the business units, a larger percentage of the employees had a negative perception of management regarding harassment and intimidation. One of the most common concerns was peer pressure (their units would receive a bonus if all members remained injury-free for a specified period). Other employees stated that CSXT officers threatened investigations and required drug tests when employees reported their injuries. In some cases, employees perceived intimidation only because CSXT officers were conducting a complete investigation of the circumstances surrounding their injuries.

FRA also interviewed employees at car and locomotive maintenance facilities. Interviews with the union representatives and employees revealed that employees were not reporting all injuries due to fear of reprisals, such as formal hearings, or harsh discipline for minor unsafe acts or mistakes.

FRA Inspectors were the most concerned about the 425 employees at one such facility, because of an agreement with management that if the injury rate was not kept low, the facility could face closure. FRA found no evidence of subjective type injuries (sprains/strains) similar to those found at other facilities or in the transportation or engineering departments. It is noteworthy to mention that the union representatives at this facility were the most concerned about injury reporting because they feared job losses if the injury ratio were to elevate.

Overall, most employees in the shops did not have a desire to discuss with FRA their thoughts about CSXT. However, some expressed their opinion that the harsh discipline may be more of a local problem and not CSXT policy.

During the review of the employee injury files, FRA identified a particular case that supported the employees' concerns. This involved a CSXT Conductor who, while pulling the cutting lever, felt sharp pain in his hand and up the arm and reported it on the day it occurred. He then sought medical attention at the hospital the next day when pain and swelling increased. The time of the visit was 3:07 p.m. He received a prescription for Motrin 600 mg and a wrist brace, and was restricted from heavy lifting. At 11:30 p.m., the employee and his supervisor visited the hospital to change the doctor's prescription and restriction. The physician's notes indicated that the Conductor was restricted to performing only certain activities. The Conductor's supervisor requested that the physician delete this entry so as to render the injury non-reportable. The result was that the prescription was changed with no subsequent restriction. However, the wrist brace was not removed. This case is under further investigation.

#### Recommendation:

CSXT has established a policy regarding intimidation and harassment in its ICP. However, CSXT needs to continue addressing this issue through meetings or training with carrier officers and labor unions.

## Train Dispatching Center Concerns, Discussion, and Recommendations

Concern: Train Dispatchers

CSXT has a shortage of Extra Board Dispatchers.

#### Discussion:

CSXT currently has a shortage of 12 Extra Board Dispatchers. The extra board is a guaranteed position, and currently there are eight individual extra boards. This shortage causes Dispatchers to work rest days or to be pulled off assignments to cover open positions. The Dispatchers are prevented from making road trips due to this situation. CSXT wants to establish a system guaranteed extra board.

#### Recommendation:

CSXT and the ATDD need to negotiate an acceptable agreement on a specified number of positions for which each Dispatcher could qualify. Currently Dispatchers can only cover extra boards in their own districts. Allowing Dispatchers to qualify for other seniority districts not only would permit better utilization of Train Dispatchers, but would free up more Dispatchers for periodic characteristics reviews of their territories.

#### Concern:

CSXT Dispatchers have not physically reviewed territories.

#### Discussion:

CSXT assured FRA that a minimum of 100 Dispatchers would physically review their respective territories in 1997. As of the date of this audit, only 12 Dispatchers have successfully completed a physical review of their territories. CSXT, in the past, has reminded FRA that no regulation currently exists that requires road review. It is CSXT's contention that a road review may be completed by viewing a video tape of the territory. CSXT maintains a library of tapes that may be checked out for home viewing, but does not provide videos of all Dispatchers' territories. The Dispatchers are compensated for performing this service. FRA reviewed CSXT's pilot video and found it be a professional and informative view of a territory. However, CSXT has not maintained this standard for the remainder of the video tapes. Eight video tapes were reviewed for effectiveness and accuracy. Some tapes lacked narration, and on other tapes, important landmarks lacked identification.

#### Recommendation:

FRA maintains that a Dispatcher should physically review territories and that video tapes should only be used as a review, not as a alternative to actual observations. In addition, CSX should fulfill its 1996 commitment to FRA.

#### Concern:

CSXT Dispatchers are performing clerical functions.

#### Discussion:

CSXT Dispatchers are required to perform a clerical function not safety-sensitive to the position. They must provide arrangements for a taxi/van to relieve crews whose time on duty has or will expire under the Hours of Service Law.

#### Recommendation:

CSXT should arrange for this service to be provided by other staff.

#### Concern:

CSXT experienced radio base station failure.

#### Discussion:

The Train Dispatcher position on one business unit handles six sub-divisions and approximately 470 miles of territory. At this location, radio communications are poor. For example, three radio base stations do not stay on line consistently. The Dispatchers are rushing communications when using these stations for fear of losing them before they finish issuing track authorities. This situation is forcing Dispatchers to sometimes guess at readbacks.

#### Recommendation:

CSXT needs to determine and correct the cause of these radio base station failures.

#### Concern:

CSXT Dispatchers use the same radio channel, resulting in overlapping communications.

#### Discussion:

When two Dispatcher positions are split during weekdays, the Dispatchers must use the same radio channel, resulting in overlapping communications. In addition, on one Dispatcher's desk, 704 authorities appear on the CRT in white rather than blue as required by CSXT's guidelines.

#### Recommendation:

CSXT needs to investigate the possibility of using separate radio channels on those positions during the split times; and providing color coordination for the 704 authorities.

#### Concern:

CSXT Dispatchers use radio frequencies improperly.

#### Discussion:

The mechanical trouble desk at times uses the Dispatchers' radio frequencies to ascertain and correct locomotive failures of trains en route.

#### Recommendation:

CSXT should examine the feasibility of the mechanical desk personnel using another radio channel or frequency.

#### Concern:

Some Dispatchers had requested the means to lock their keyboards for security reasons.

#### Discussion:

Some Dispatchers desired a means to lock the keyboards of their consoles when they had to leave their desks. The locked keyboard would prevent any unauthorized entries for use of signals, switches, or removal or additions of authorities.

#### Recommendation:

CSXT should review the possibility of a software design to allow a Dispatcher to sign off/on a keyboard with a pin number or other identification to prevent unauthorized use.

#### Concern:

Track profiles are not available at each Dispatcher's desk.

#### Discussion:

Track profiles concerning the designated territories for individual desks should be made available at each desk. Some desks have profiles drawn by individuals and others have no reference materials.

#### Recommendation:

CSXT needs to provide track profiles to each Dispatcher.

#### Concern:

Overview projection screens at the dispatching center are unfocused and difficult to read.

## Discussion:

Some Dispatchers have remarked that the overview projection screens are not in focus, and that they have a difficult time identifying certain items.

#### Recommendation:

CSXT should correct the focal quality of items on the overview projection screens.

#### Concern:

CSXT Yardmasters repeatedly call Dispatchers until they answer.

#### Discussion:

The Train Dispatcher position identified as "AM" on the C&O Business Unit has an open microphone to the Yardmasters at Clifton Forge and Hinton. This microphone is accessed on the AVTEC system and the Dispatcher is paged by the Yardmaster. The distraction caused by the persistent calling from the Yardmaster could result in the Dispatcher making an error in his transmissions to other employees.

#### Recommendation:

Yardmasters should be instructed to allow Dispatchers time to answer calls, rather than calling them continuously.

#### Concern:

CSXT's procedural instructional manual, used by Dispatchers, is not up-to-date.

#### Discussion:

The procedural instruction manual (PIM) for Dispatchers has not been updated since the inception of the network center. The PIM is available to Dispatchers at each desk, the community bulletin board, and in a computer program.

#### Recommendation:

The PIM must be updated as soon as practicable to alleviate any confusion that might ensue for new Dispatchers regarding operational instructions.

#### Concern:

CSXT Dispatchers are not reviewing readbacks.

#### Discussion:

FRA Inspectors observed Dispatchers who did not review readbacks from employees in the field as they repeated authorities.

#### Recommendation:

CSXT must take immediate corrective action to ensure compliance with the operating rules.

#### Concern:

CSXT radio parts are worn and in need of repair.

#### Discussion:

On August 11, the "AL" Console Train Dispatcher had feedback over the radio head set. The General Chairman made the statement that this was due to parts wearing out with the radio system.

FRA spoke with the manager of Network Control CSXT Communications Solutions. The manager explained that the feedback had occurred because two radio base stations were selected at the same time. The manager explained that this was possible when both radio base stations were on separate circuits; if the radio base stations had been on the same circuit, then only one radio could have been selected at a time. Since this incident, CSXT has issued instructions to the Train Dispatchers to ensure that they disconnect one radio before selecting another after completing conversations. In addition, the Safety Committee worked on this issue and decided to place permanent instructions at each of the Train Dispatchers' consoles to remind them to disconnect one radio base station before selecting another.

#### Recommendation:

The above steps CSXT has taken to date provide only a short-term solution until such time that newer technology can be implemented.

#### Concern:

Some Dispatchers work excess service in violation of the Hours of Service Law.

#### Discussion:

On August 7 and 8, 1997, excess service was performed by the second and first shift AC console Train Dispatchers. In order for the Train Dispatchers to work the Dispatcher console keyboard beyond eight hours, the railroad bypassed the security feature designed to flag and record any excess service performed by Train Dispatchers. This bypass procedure permitted two Train Dispatchers to perform excess service and operate the CAD system, but failed to maintain the proper Hours of Service records. However, the safety system of the CAD system was fully operational. In this incident, the Train Dispatchers' record of train movements failed to indicate that either of the Train Dispatchers had performed excess service during the third shift on August 7 and first shift on August 8. Currently, there are no procedures in place for the identification of Train Dispatchers operating the system in the bypass mode.

Four violations were documented: two for failing to properly maintain Hours of Service records (Dispatcher's record of train movements) in accordance with 49 CFR Section 228.17 (a)(3); and two for working excess service in non-compliance with the Hours of Service Law.

#### Recommendation:

CSXT must develop a procedure for identifying Train Dispatchers who operate the system in this bypass mode to ensure compliance with the Hours of Service Law.

## Crew Management Center Concerns, Discussion, and Recommendations

## Concern: <u>Crew Dispatchers</u>

Crew Dispatchers have been working excessive overtime because of 37 vacancies in the

center (i.e. in February, 100 people were forced to work back-to-back shifts). Some of the service lane Crew Dispatchers have been handling the crew utilization for five to eight terminals.

#### Discussion:

CSXT needs to hire an adequate number of Crew Dispatchers to reduce the excessive work load at the center. Thirty-seven vacancies existed at the center prior to the formalization of the joint team (CSXT, FRA, Rail Labor).

#### Recommendation:

CSXT should immediately develop an Action Plan to fill the vacancies at the CMC.

## Concern: Crew Balancing

Train Dispatchers are not effectively communicating with crew management on train crew resource allocation.

#### Discussion:

Train Dispatchers have not been effectively communicating with crew management on train crew resource allocation. In addition, crew balancing issues are an integral part of the crew release problems.

#### Recommendation:

Contractually, crew balancing is designated as Dispatcher's work; however, FRA believes that the procedure and communications in effect are at the root of the problem. Therefore, FRA recommends that representatives from ATDD, TCU, CSXT, and FRA form an ad hoc committee to resolve this issue.

## Concern: Field Supervisor Interference

CSXT supervisors are circumventing the RTT-1 program.

#### Discussion:

CSXT field supervisors and users in network operations have been circumventing the RTT-1 program. Train crew assignments are being altered by Yardmasters, Trainmasters, and Superintendents. Chief Train Dispatchers have been setting back call times to circumvent the RTT-1 system. Power managers do not always update RTT-1.

CSXT should correct these problems concerning improper utilization of the RTT-1 system. This will be an ongoing project which parallels the software changes and the additional training of the Train Dispatchers.

#### Recommendation:

CMC senior managers need to enforce the use of RTT-1 across the CSXT system. The CMC needs to perform daily analysis of each service lane and conduct root analysis of the problems.

## Concern: Supervisory Coverage at CMC

CSXT lacks adequate supervisory coverage at the CMC.

#### Discussion:

The majority of complaints received by FRA from the UTU and BLE involved the second shift, third shift, and weekends. Staffing levels were not sufficient to address the phones or the contractual issues.

Yard Switchmen who were not available for work on other subdivisions were being called in error by the Crew Callers. Crew Dispatchers should be trained on the contractual agreements and should not send train crew members on assignments they are not qualified to perform.

#### Recommendation:

FRA recommends that CSXT immediately develop an Action Plan to staff supervisory levels.

## Concern: Training

The Crew Callers, Chief and Assistant Chief Dispatchers, as well as personnel in the field, are not properly trained on the (RTT-1) system or the Transportation Employees Call System (TECS).

#### Discussion:

CSXT is rewriting software, and will train all affected employees, including Local Chairmen, on the new system. CSXT also will develop written policies to ensure discipline within the system.

Crew Dispatchers are required to be knowledgeable about the various union agreements; however, in many cases, crew callers are assigned unfamiliar territories.

#### Recommendation:

CSXT should train all affected employees, including Local Chairmen, on the new system.

## Concern: Interruption of Rest

Train and engine service employees are being called during their rest periods by Audex and Crew Dispatchers.

#### Discussion:

The Audex program is being circumvented by the Train Dispatchers. When employees try to call the Crew Dispatchers to mark off duty or to discuss an assignment, the phone lines are busy.

Until FRA became involved with the interruption of rest for train and engine crews, CSXT was not aggressively addressing this safety concern.

The UTU and BLE have agreed to conduct a pilot project in which crews will receive

eight hours of undisturbed rest. The pilot will last 60 to 90 days and will involve the entire Baltimore Service Lane.

## Recommendation:

CSX should develop a plan to evaluate the pilot project and develop a similar system-wide program.